

**FEIN, SUCH, KAHN & SHEPARD, PC.**  
Counsellors at Law  
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Parsippany, New Jersey 07054  
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Attorneys for Secured Creditor  
R.A. LEBRON, ESQ. (RL-7029)  
ZCW890

IN RE:

DEANNA L. FIELD and  
EDWARD Q. FIELD

Debtors.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Chapter 7

Case No. 08-35580 MBK

**NOTICE OF MOTION TO VACATE  
AUTOMATIC STAY PURSUANT TO 11  
U.S.C. 362 (d)**

Hearing Date: March 02, 2009

TO: BARRY W. FROST, ESQ.  
TEICH GROH  
691 STATE HIGHWAY 33  
TRENTON, NJ 08619-4407  
Debtors' Attorney

JOHN MICHAEL McDONNELL  
TRENK DIPASQUALE, ET AL.  
115 MAPLE AVENUE  
SUITE 201  
RED BANK, NJ 07701  
Trustee in Bankruptcy

DEANNA L. FIELD  
EDWARD Q. FIELD  
1249 BEAR TAVERN ROAD  
TITUSVILLE, NJ 08560  
Debtors.

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for the Secured Creditor, COUNTRYWIDE HOME LOANS SERVICING, LP, shall move before the, United States Bankruptcy Judge, HONORABLE MICHAEL B. KAPLAN, 402 EAST STATE STREET, TRENTON NJ 08608 on the 2<sup>nd</sup> day of March, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. 362 (d) (1) and/or (2) to permit COUNTRYWIDE HOME LOANS SERVICING, LP, to proceed against the Debtors and to foreclose upon residential real property of the Debtors known as 1249 BEAR TAVERN RD, TITUSVILLE, NJ 08560 (hereinafter "Premises"), by any lawful means in the Superior Court of New Jersey, Chancery Division; and

B. For such other relief as is just.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Affidavit of COUNTRYWIDE HOME LOANS SERVICING, LP.

Dated: February 10, 2009

**FEIN, SUCH, KAHN & SHEPARD, PC.**  
Attorneys for Secured Creditor,  
**COUNTRYWIDE HOME LOANS SERVICING, LP**

By: /S/ R.A. LEBRON, ESQ.